

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

IN RE: PHARMACEUTICAL  
INDUSTRY AVERAGE WHOLESAL  
PRICE LITIGATION

THIS DOCUMENT RELATES TO  
ALL ACTIONS

MDL NO. 1456

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

RECEIVED PAID

RECEIPT #

AMOUNT \$

DATE

12/29/04

ASSENTED TO MOTION FOR ADMISSION *PRO HAC VICE*

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts (the "Local Rules"), Baxter Healthcare Corporation and Baxter International Inc. ("Baxter") hereby moves this Court to grant that Jason D. Wallach, Esq., of Dickstein Shapiro Morin & Oshinsky LLP, 2101 L Street, N.W., Washington, DC 20037-1526, be admitted to appear on behalf of defendant Baxter and to practice before this Court in the above-entitled action. As grounds for this motion, the undersigned counsel respectfully represents the following:

1. Mr. Wallach is and has been a member in good standing of the bars of the following Federal Courts:

United States District Court for the District of Columbia

2. Mr. Wallach is and has been a member in good standing of the bar of the District of Columbia since 1997 and the bar of the State of Maryland since 1996;

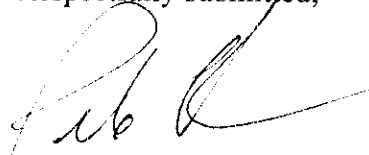
3. There are no disciplinary proceedings pending against Mr. Wallach as a member of the bar in any jurisdiction;

4. Mr. Wallach has represented to the undersigned counsel that he is familiar with the Local Rules of the United States District Court for the District of Massachusetts; and

5. In further support of this motion, Mr. Wallach has submitted herewith his Certificate of Good Standing as required by Local Rule 83.5.3 and, attached as Exhibit 1, a true and correct copy of his certificate of good standing from the District of Columbia.

WHEREFORE, the undersigned counsel respectfully moves Mr. Wallach's admission to practice before this Court *pro hac vice*.

Respectfully submitted,



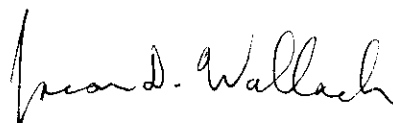
(Peter E. Gelhaar, (BBO#: 188310)  
DONNELLY, CONROY & GELHAAR, LLP  
73 Tremont Street  
Boston, MA 02108  
(617) 720-2880

Dated: December 20, 2004

**CERTIFICATE OF GOOD STANDING**

Pursuant to Rule 83.5.3 of the Local Rules of the United States District Court for the District of Massachusetts, I, Jason D. Wallach, Esq., hereby certify that: (1) I am admitted to the bars of the Courts described in the foregoing motion; (2) I am a member of the bar in good standing in every jurisdiction where I have been admitted to practice; (3) No disciplinary proceedings are pending against me as a member of any bar in any jurisdiction; and (4) I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Respectfully submitted,

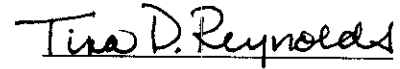


Jason D. Wallach

Dated: December 17, 2004

**CERTIFICATION PURSUANT TO LOCAL RULE 7.1**

Pursuant to Local Rule 7.1(A)(2), the undersigned certifies that counsel for defendants conferred with counsel for plaintiffs on this motion, and that counsel for plaintiffs assented to the motion.



Tina Ducharme Reynolds

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was delivered to all counsel of record by electronic service pursuant to Paragraph 11 of Case Management Order No. 2, by sending on December 20, 2004, a copy to Verilaw Technologies for posting and notification to all parties.



Tina Ducharme Reynolds